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November 8, 2017

VIA, ELECTRONIC FILING

The Honorable Jocelyn Boyd
Chief Clerk and Administrator
The Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

Re: • **Docket 2017-281-E**
• **Objection to Second Set of Discovery**

Dear Ms. Boyd:

Enclosed for filing, please find the Objection to Duke Energy Carolinas, LLC and Duke Energy Progress, LLC's Second Set of Interrogatories and Production of Documents and Certificate of Service.

Please notify the undersigned if you there is anything else you may need.

Respectfully Submitted,

/s/ _____
Richard L. Whitt

RLW/cas

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2017-281-E**

IN RE: Shorthorn Solar, LLC; Rollins Solar, LLC;)
 Juniper Solar, LLC; Meslam Solar, LLC;)
 Culpepper Solar, LLC; Ashley Solar, LLC;)
 Jefferson Solar, LLC; Madison Solar, LLC;)
 Fairfield Solar, LLC; Bell Solar, LLC;)
 Webster Solar, LLC; B&K Solar, LLC;)
 GEB Solar, LLC; Ross Solar, LLC;)
 Summerton Solar Farm, LLC;)
 Clarendon Solar Farm, LLC;)
 Azalea Solar LLC; Cardinal Solar LLC;)
 Sunflower Solar LLC; Cosmos Solar LLC;)
 Zinnia Solar LLC; Chester PV1, LLC;)
 Ninety-Six PV1, LLC; Newberry PV1, LLC;)
 Bradley PV1, LLC; Jonesville PV1, LLC;)
 Ft. Lawn PV1, LLC; and)
 Mt. Croghan PV1, LLC,)
)
 Complainants/Petitioners,)
)
 v.)
)
 Duke Energy Carolinas, LLC and)
 Duke Energy Progress, LLC,)
)
 Defendants/Respondents.)

**OBJECTION
TO DUKE ENERGY CAROLINAS,
LLC AND DUKE ENERGY
PROGRESS, LLC'S
SECOND SET OF
INTERROGATORIES AND
REQUEST FOR PRODUCTION OF
DOCUMENTS
TO
COMPLAINANTS/PETITIONERS**

INTRODUCTION

Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, ("Duke"), submitted their Second discovery request to Complainants/Petitioners requesting their response by Tuesday (*sic*), November 9, 2017. The Complainants/Petitioners object as follows.

OBJECTION

Duke previously submitted its joint "First Request of Production of Documents", which was apparently misdenominated and included fifty interrogatories. Page "1" of that discovery request and Duke's Certificate of Service both indicated that the discovery request was on behalf of "Duke Energy Carolinas, LLC **and** Duke Energy Progress, LLC", (emphasis not in original).

R. 103-835, of this Commission's Rules and Regulations applies and also Rule 33(b)(9) of the South Carolina Rules of Civil Procedure and Duke has reached the limitation, from the Rules of fifty Interrogatories, because Duke's First discovery request was jointly propounded and each Company has previously submitted fifty Interrogatories. Duke's single Request for Production, in Duke's Second discovery Request is moot, because of this objection.

/s/

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Attorney for Southern Current LLC; Adger
Solar, LLC; NARENCO, Ecoplexus, Inc., and
the Complainants.

November 8, 2017
Columbia, South Carolina

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
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IN RE: Shorthorn Solar, LLC; Rollins Solar, LLC;)
 Juniper Solar, LLC; Meslam Solar, LLC;)
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 Ninety-Six PV1, LLC; Newberry PV1, LLC;)
 Bradley PV1, LLC; Jonesville PV1, LLC;)
 Ft. Lawn PV1, LLC; and)
 Mt. Croghan PV1, LLC,)

Complainants/Petitioners,)

v.)

Duke Energy Carolinas, LLC and)
 Duke Energy Progress, LLC,)

Defendants/Respondents.)

CERTIFICATE OF SERVICE

I, Carrie A. Schurg, an employee of Austin & Rogers, P.A., certify that I have served the Objection to Duke Energy Carolinas, LLC and Duke Energy Progress, LLC's Second Set of Interrogatories and Production of Documents and this Certificate of Service, via electronic mail on November 8, 2017, Service via electronic mail on November 8, 2017, as indicated below.

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[Signature Page Follows]

November 8, 2017
Columbia, South Carolina

/s/ _____
Carrie A. Schurg